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August 3, 2021

VIA ECF

The Honorable Lorna G. Schofield
United States District Court for the Southern District of New York
40 Foley Square
New York, NY 10007

Re: Jane Doe, et al. v. The Trump Corporation, et al., 18-cv-9936 (LGS)

Dear Judge Schofield:

I write on behalf of Plaintiffs and the putative classes in the above-referenced action pursuant to the Court's June 1, 2020 Order (Doc. No. 282). That Order noted that the United States Court of Appeals for the Second Circuit had granted Defendants' request for an administrative stay of this action, and the Order directed the parties to file a status update within one week of the Second Circuit's ruling on Defendants' then-pending stay motion. (*Id.*) The Order further directed the parties, in the event that Defendants' motion for a stay pending appeal were denied, to propose new deadlines for all dates affected by the administrative stay. (*Id.*)

On July 28, 2021, the Second Circuit affirmed this Court's prior orders denying Defendants' and ACN's motions to compel arbitration, resolving the issues on appeal. (*See* 2d Cir., Case No. 20-1228, Doc. No. 232.) The disposition of the appeals terminated the previously entered administrative stay (*see* 2d Cir. Doc. No. 145), and a few hours later, the Second Circuit entered an order formally denying as moot Defendants' and ACN's motions for a stay pending appeal (2d Cir. Doc. No. 240).

Later that day, Plaintiffs reached out to Defendants to discuss new deadlines. In the days since, we have been informed that Defendants are in the process of retaining new counsel, and we have held an initial telephone conference with Defendants' incoming counsel, who we understand intends to enter an appearance in the coming days. Accordingly, and as discussed with Defendants' incoming counsel, we respectfully propose the parties submit a joint status letter to the Court with a modified case management proposal, or their respective proposals, by August 13, 2021, after having had an opportunity to meet and confer.

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Should the Court prefer to hear from the parties sooner, we will, of course, proceed according to the Court's direction.

Respectfully submitted,



John C. Quinn

cc: Counsel of Record (*via* ECF)